

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

---

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**vs.**

**REX VENTURE GROUP, LLC  
d/b/a ZEEKREWARDS.COM, and  
PAUL BURKS,**

**Defendants.**

---

**No. 3:12-CV-519**

**CONSENT MOTION FOR EXTENSION OF TIME IN FILING FOURTH QUARTER  
2014 APPLICATION FOR FEES AND EXPENSES**

Receiver Kenneth D. Bell, with the consent of the Securities and Exchange Commission, respectfully requests an extension of time until April 15, 2015 to file Receiver's Application for Fees and Expenses for the Fourth Quarter of 2014 ("Fee Application"). In support of this motion, the Receiver respectfully represents and states as follows:

1. The Order Appointing Temporary Receiver, DE No. 4, directs the Receiver to file Quarterly Fee Applications within 45 days after the end of each calendar quarter. *See* Amended Receivership Order. ¶XIV.58.
2. Allowing an extension until April 15, 2015 would give the Receiver and his team additional time to compile information related to the Fee Application.
3. The Securities and Exchange Commission has consented to the extension.

WHEREFORE, the Receiver respectfully requests the Court extend the time to file the Fee Application to April 15, 2015.

Respectfully requested this 26<sup>th</sup> day of March, 2015

By: /s/ Kenneth D. Bell  
Kenneth D. Bell, Receiver, Esq.  
McGuireWoods LLP  
201 North Tryon Street, Suite 3000  
Charlotte, North Carolina 28202  
Telephone: 704-343-4620  
Fax: 704-373-8836  
E-mail: [kbell@mcguirewoods.com](mailto:kbell@mcguirewoods.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic copies to counsel of record registered to receive electronic service.

Dated: March 26, 2015

/s/ Kenneth D. Bell